

**LAW OFFICE OF
RICHARD E. SIGNORELLI
ATTORNEY AT LAW**

52 Duane Street, 7th Floor, New York, New York 10007

Telephone: (212) 254-4218 Cellular: (917) 750-8842 Facsimile: (212) 254-1396

rsignorelli@nycLITIGATOR.comSM

richardsignorelli@gmail.com

www.nycLITIGATOR.comSM

April 3, 2020

Via Electronic Filing

Hon. William H. Pauley III
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

The Government is directed to consult with the Bureau of Prisons and file a letter in regards to its position on this request by April 9, 2020.

SO ORDERED:


WILLIAM H. PAULEY III
U.S.D.J.

Re: United States v Kevin Pinero
11 CR 576 (WHP)

April 6, 2020

Dear Judge Pauley:

I am counsel for the defendant in the above-referenced case, Kevin Pinero (Reg. # 66768-054), who is detained at the Metropolitan Detention Center, Brooklyn ("MDC"), awaiting a re-sentencing in this case that is currently scheduled to take place on June 5, 2020.

I have recently been informed that Mr. Pinero has been labeled as a high risk inmate for potential COVID-19 complications by the Bureau of Prisons ("BOP") pursuant to Center for Disease Control guidelines. It is my understanding that these complications relate to my client having high blood pressure and asthma.

At the present time, despite being classified as a high risk inmate, Mr. Pinero is not being provided with any protective items and is housed in a two person cell. It is my understanding that there are available cells at the MDC that can be used by one inmate only.

In order to protect Mr. Pinero's health from the COVID-19 virus as a high risk inmate, and in lieu of a bail application being made at this time, I respectfully request that Your Honor order the following (to which the Government takes no position):

1. The MDC shall provide Kevin Pinero (Reg. # 66768-054) with personal protective items including a N95 mask (or the next best available mask) and gloves;

SO ORDERED:

U.S.D.J.

2. The MDC shall allow Kevin Pinero (Reg. # 66768-054) to have his own cell if one is or soon becomes available.

SO ORDERED:

U.S.D.J.

Thank you for your consideration of this matter.

Respectfully,

/s/ Richard E. Signorelli

Richard E. Signorelli

cc (via email):

Jonathan McCann, Courtroom Deputy
AUSA Andrew A. Rohrbach

cc (via 1st Class Mail):

Mr. Kevin Pinero, Reg. # 66768-054